

EXHIBIT 1

From: Theresa Troupson
Sent: Wednesday, May 21, 2025 2:51 PM
To: Kristin Bender
Cc: mitra@ahouraianlaw.com; Local KAF. Counsel; Summer Benson; Stacey Ashby; Local MS. Counsel; Amit Shertzer; Vaneta Birtha; Miles Cooley; Cortni Davis; Bryan Freedman; Jose Perez; Jason Sunshine; Michael Gottlieb; Esra Hudson; Stephanie Roeser; Matthew Bruno; Katelyn Climaco; Meryl Conant; Governski; Nathan Aaron E.; Michaela Connolly; Melissa Taustine; Ellyn Garofalo; Amir Kaltgrad; Rose Khatchikian
Subject: Re: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL, No. 1:25-cv-00449-LJL

Counsel:

As we told you, our clients will fully comply with their discovery obligations and are in the process of doing so. We are working diligently to process the voluminous documents requested by the Lively Parties and will produce documents on a rolling basis, likely beginning this week. If you have authority that more is required – including any obligation to provide the information (including attorney work product) demanded in your email – please provide it.

That said, we are willing to meet and confer with you consistent with section III of the joint ESI stipulation. If you would like to engage in that discussion, please provide your proposed availability.

Regards,
Theresa Troupson

On May 19, 2025, at 2:27 PM, Bender, Kristin <KBender@willkie.com> wrote:

Counsel,

In light of your recent representations to the Court that collections for your clients are well underway, see Dkt No. 207, we are following up once more to seek necessary information regarding the Wayfarer Parties' collections and custodial information. Given your representation to the Court, it is clear that your earlier refusal to discuss this information, including on our May 5 conferral, was intentionally obstructive and that you have relevant information regarding these collections, including custodians, devices, and repositories.

For each of the relevant individual Wayfarer Parties you represent—Justin Baldoni, Jamey Heath, Steve Sarowitz, Melissa Nathan, and Jennifer Abel (the relevant "Individual Defendants")—please indicate as to each:

1. Whether personal emails have been or will be collected, specifying the email domain(s).
2. Whether professional emails have been or will be collected, specifying the email domain(s).
3. Whether personal devices have been or will be collected, including but not limited to laptops, desktops, iPads, cell phones, hard drives, flash drives, and tablets. Please specify which devices, applications, and accounts have been or will be collected for each Individual Defendant.
4. Whether professional devices have been or will be collected, including not limited to laptops, desktops, iPads, cell phones, hard drives, flash drives, and tablets. Please specify which devices, applications, and accounts have been or will be collected for each Individual Defendant.

5. Whether hard copy files were collected, specifying the source repository.
6. Whether such collections were conducted by a vendor or were conducted by counsel and/or the Individual Defendant.

For each of the entity Wayfarer Parties—It Ends With Us Movie LLC (“IEWU LLC”), Wayfarer Studios LLC (“Wayfarer”) and The Agency Group PR LLC (“TAG”)—please indicate as to each:

1. The list of custodians selected for collection, and how were they identified to be relevant to the pending document requests and the consolidated action.
2. Whether all personal and/or all professional emails, devices (e.g., laptops, desktops, iPads, cell phones, hard drives, flash drives, and tablets), applications, and accounts have been or will be collected from these custodians. . Please specify which devices, applications, and accounts have been or will be collected for each.
3. What central repositories have been or will be collected for IEWU LLC, Wayfarer, and TAG’s documents, such as shared drives, shared folders, and other filing systems.
4. Whether there is any instant messaging function available to entity officers, directors, and employees, such as Slack, and whether it was or will be collected for custodians.
5. Whether hard copy files were collected, specifying the source repository.
6. Whether such collections were conducted by a vendor or were conducted by counsel, in-house counsel, and/or the Individual Defendant, or which combination thereof.

In connection with each of the above categories, please specify, as to each of the aforementioned Wayfarer Parties and custodian, which collections have been completed and which remain to be completed.

If we do not receive a substantive and complete response in writing on these items by 6:00 p.m. EST on Wednesday (5/21), we will understand that you are refusing to provide us this information and are at an impasse, and will proceed accordingly.

Best,
KB

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